# Exhibit 11

# Case 2:14-cv-11916-GCS-SDD ECF No. 121-12, PageID.4137 Filed 07/12/16 Page 2 of 13 FEES ANALYSIS OF OPPOSING COUNSELS' BILLING ENTRIES

#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry
3/24/2014	KeithF	1.5	Reviewed file and drafted demand letter	\$ 412.50	
			Drafting complaint and reviewing documents		
4/9/2014	KeithF	5	provided by the client	\$ 1,375.00	Excessive
					Excessive
4/22/2014	KeithF	3	Edited complaint and discussed complaint with RGM	\$ 825.00	Conference/Strategy
			Researched issues regarding service of process and		Conference/strategy
5/16/2014	KeithF	3	strategized with RGM	\$ 825.00	Excessive
			Reviewed file and strategized with RGM regarding		Conference/strategy
6/10/2014	KeithF	0.7	settlement discussions	\$ 192.50	
			Review offer letter to employer, discussion with		Vague
6/10/2014	RichardM	0.75	Keith Flynn, review matters in file	\$ 225.00	Conference/strategy
			Review letter to employer, discussion with		Vague
6/14/2014	RichardM	1.5	associates	\$ 450.00	Conference/strategy
7/10/2014	KeithF	2	26(f) telephone conference and edited 26(f) plan	\$ 550.00	
7/17/2014	KeithF	1.5	prepped for and attended 26f conference	\$ 412.50	
8/13/2014	KeithF	1	Reviewed changes to protective order with the client	\$ 275.00	
			Reviewed initial disclosures and our discovery		
8/13/2014	KeithF	2	requests and made edits	\$ 550.00	Excessive
9/30/2014	KeithF	0.5	Drafted witness list and reviewed file	\$ 137.50	
					Conference/strategy
10/2/2014	KeithF	0.2	Reviewed file and strategized regarding discovery	\$ 55.00	Vague
			Reviewed discovery responses from defendant and		Conference/strategy
11/6/2014	KeithF	0.2	strategized with AV	\$ 55.00	
			Reviewed discovery and strategized way to resolve		Conference/strategy
12/4/2014	KeithF	2	the motion to compel	\$ 550.00	Excessive
			Reviewed discovery responses and phone call with		
12/5/2014	KeithF	1	opposing counsel	\$ 275.00	
			Reviewed and emailed resolved unresolved issues		
12/8/2014	KeithF	1	regarding our motion to compel	\$ 275.00	
12/12/2014	KeithF	0.5	Reviewed stip and orders and emailed OC	\$ 137.50	
			Emailed court and opposing counsel; responded to		
12/15/2014	KeithF	0.1	an email from opposing counsel	\$ 27.50	Vague

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description		Fees	Other Reasons to Exclude Entry	
			Phone call with client and reviewed file re				
1/8/2015	KeithF	0.7	Defendant's subpoena requests	\$	192.50		
1/14/2015	KeithF	0.5	Reviewed file and emailed opposing counsel	\$	137.50	Vague	
			Drafted supplemental discovery responses and				
1/22/2015	KeithF	1	emailed client	\$	275.00	Vague	
			Emailed opposing counsel and spoke with client re				
1/26/2015	KeithF	0.25	scheduling depositions	\$	68.75		
			Reviewd proir correspondence and emailed OC				
			about Defendant's schedule for depositions and our				
2/2/2015	KeithF	0.25	discovery responses	\$	68.75		
2/3/2015	KeithF	1	Reviewed file and emailed client and OC	\$	275.00		
			Reviewed documents produced in discovery and			Vague	
2/6/2015	KeithF	5.5	emailed client	\$	1,512.50	Excessive	
			Reviewed discovery documents and drafting				
2/10/2015	KeithF	6	deposition questions for Bork	\$	1,650.00	Excessive	
			Reviewed discovery responses and drafting				
2/11/2015	KeithF	6	deposition questions for Bork and Wisheart	\$	1,650.00	Excessive	
			Reviewed correspondence and emailed OC several				
2/12/2015	KeithF	1	times re discovery issues	\$	275.00		
			Researched law re authorization forms and looked			Conference/strategy	
2/12/2015	KeithF	3	up Jill Hood and strategized with AV	\$	825.00	Excessive	
			Reviewed discovery documents and prepping				
2/12/2015	KeithF	4	deposition questions	\$	1,100.00	Excessive	
2/13/2015	KeithF	0.5	Reviewed file and emailed OC	\$	137.50	Vague	
l			Reviewed our discovery responses and strategized	<b> </b>		Conference/strategy	
2/13/2015	KeithF	1	with AV	\$	275.00	Vague	
			Emailed OC to schedule dep dates with OC and				
			discussing discovery issues and followed up with				
2/18/2015	KeithF	0.5	client	\$	137.50		

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description		Fees	Other Reasons to Exclude Entry	
						Review	
						Conference/strategy	
2/18/2015	KeithF	0.5	Reviewed file and strategized	\$	137.50	Vague	
2/24/2015	KeithF	0.5	Reviewed file and emailed OC	\$	137.50	Vague	
			Reviewed prior correspondence and emailed OC re				
2/25/2015	KeithF	0.7	dates for deps and followed up with client	\$	192.50	Vague	
2/27/2015	KeithF	0.2	Emailed OC and client	\$	55.00	Vague	
			Emailed OC and client and reviewed file and			Vague	
3/2/2015	KeithF	0.2	strategized	\$	55.00	Conference/strategy	
						Vague	
						Conference/strategy	
3/3/2015	KeithF	1	Emailed client and strageized with AV	\$	275.00	Excessive	
						Vague	
3/4/2015	KeithF	1	Emailed client and reviewed file	\$	275.00	Excessive	
			Reviewed prior correspondence and emailed OC re				
			his unilateral dep notice and emailed back and forth				
3/4/2015	KeithF	0.5	about scheduling deps.	\$	137.50		
3/5/2015	KeithF	0.1	Reviewed file and emailed OC re Hood's dep	\$	27.50		
			Reviewed defendants requests and reviewed				
3/11/2015	KeithF	3	Defendant's reply re Defendant's motion to compel	\$	825.00	Excessive	
			Emailed OC and client re scheduling deps and OC's				
			refusal to turn over documents relating to their				
			employees identified as having been terminated for				
3/12/2015	KeithF	1.5	job abandonment	\$	412.50	Excessive	
2 / 2 / 2 2 / -	l					<u> </u> .	
3/13/2015	KeithF	3	Reviewed discovery and prep for depositions	\$	825.00	Excessive	
2/45/2045				ړ	025.00	<u> </u> .	
3/15/2015	KeithF	3	Reviewed discovery and prep for depositions	\$		Excessive	
3/16/2015	KeithF	10	Prep for and attended Bork dep	\$	-	Excessive	
3/17/2015	KeithF	7	Prep for and attended Wiseheart dep	\$	1,925.00	Excessive	

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description		Fees	Other Reasons to Exclude Entry	
			Reviewed discovery responses after taking			Conference/strategy	
3/17/2015	KeithF	2	Wisheart's dep and strategized	\$	550.00	Excessive	
3/18/2015	KeithF	1	Emailed OC and client regarding discovery issues	\$	275.00	Vague	
0/40/0045		0.4	Reviewed protective order and email to OC re	_			
3/19/2015	KeithF	0.1	proposed changes to protective order	\$	27.50		
			Deviated discovery decompating proporation for			Conformed (strategy)	
2/20/2015	KeithF	2	Reviewed discovery document in preparation for	ب	025.00	Conference/strategy Excessive	
3/20/2015	Keitiir	3	client's deposition and strategized Prepped for and attended Plaintiff's dep and	\$	825.00	Excessive	
3/23/2015	KeithF	13	reviewed discovery and legal research re HIPAA	\$	2 575 00	Excessive	
3/23/2013	Keitiir	13	reviewed discovery and legal research re HIPAA	Ą	3,373.00	Lxcessive	
3/24/2015	KeithF	3	Reviewed reordings to supplement and strategized	\$	825.00	Conference/strategy	
, ,			3 11			Vague	
3/24/2015	RichardM	1.25	Review draft letter, discussion with associates	\$	375.00	Conference/strategy	
			Emailed OC re protective order and OC unilaterily				
			modifiying Hood's dep and strategized with AV and			Conference/strategy	
3/25/2015	KeithF	2	reviewed protective order	\$	550.00	Excessive	
			Reviewed discovery and editing questions in prep for				
3/25/2015	KeithF	2	Hood's dep	\$	550.00		
			Emails to OC re Hood's dep being rescheduled and				
3/26/2015	KeithF	2	drafting stipulated order re Hood	\$	550.00		
l				١.			
3/26/2015	KeithF	2	Reviewed dep exhibits and questions for Hood dep	\$	550.00		
		_	Spoke with client and OC via email and phone and				
3/27/2015	KeithF	3	drafted stip and order re Hood	\$	825.00		
0/00/00:5		_		۱,		Conference/strategy	
3/30/2015	KeithF	2	Edited motion to compel and meeting with Richard	\$	550.00		
0/04/004=			Emailed OC and edited stip and order re Hood and	,	co= ==	Conference/strategy	
3/31/2015	KeithF	2.5	discussed with Richard	\$	687.50	Excessive	
0/04/004=	B. 1 15.1		Review emails about phone issues, discuss issue with	,	225 62	Vague	
3/31/2015	RichardM	0.75	associates	\$	225.00	Conference/strategy	

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry	
			Emailed OC re forensic examination of phone and		Conference/strategy	
4/1/2015	KeithF	1.7	discussed with RGM	\$ 467.50	Excessive	
			Review emails from opposing counsel, discuss issue		Vague	
4/1/2015	RichardM	0.1	with associates concerning motions	\$ 30.00	Conference/strategy	
			Emailed OC and client re forensic examination of		Conference/strategy	
4/6/2015	KeithF	1.5	phone and discussed with RGM	\$ 412.50	Excessive	
			Review emails from opposing counsel, discussion		Vague	
4/6/2015	RichardM	1.25	with associates about motion for discovery	\$ 375.00	Conference/strategy	
			Reviewed prior correspondence and changes to the			
			stip and order and emailed OC re stip and order and		Conference/strategy	
4/10/2015	KeithF	1	discussed with RGM	\$ 275.00	Excessive	
			Review matters in file concerning stipulation and		Vague	
4/10/2015	RichardM	0.75	order, discussion with associates	\$ 225.00	Conference/strategy	
4/20/2015	KeithF	0.5	Reviewed stip and order and emailed OC	\$ 137.50	Excessive	
			Reviewed subpoena documents and emailed court			
4/27/2015	KeithF	1	reporter	\$ 275.00	Vague	
			Emailed OC re continuation of client's dep and spoke			
4/28/2015	KeithF	0.2	with client	\$ 55.00		
					Vague	
5/1/2015	AGraham	4	Review pleadings, discovery for Hood Deposition	\$ 1,000.00	Excessive	
			Hood dep and emailed OC re his attempt to use the			
			earliest cancellation of Hood's dep to extend the			
			summary judgement deadline and discussed with		Conference/strategy	
5/5/2015	KeithF	9	RGM	\$ 2,475.00	Excessive	
			Review emails from opposing counsel, discuss		Vague	
5/5/2015	RichardM	1	matter with associates	\$ 300.00	Conference/strategy	
			Reviewed defendant's motion to extend and		Conference/strategy	
5/6/2015	KeithF	1.5	strategized	\$ 412.50	Excessive	
			Review matters in file, concerning filing from			
			attorney for defendant, discuss issues with		Vague	
5/7/2015	RichardM	0.75	associates (5/7 -5/8)	\$ 225.00	Conference/strategy	
			Review emails, discussion with associates regarding		Vague	
5/20/2015	RichardM	1	proper representation	\$ 300.00	Conference/strategy	

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description		Fees	Other Reasons to Exclude Entry	
			Reviewed depositions and discovery for response to				
6/3/2015	KeithF	2	MSJ and discussed with AG	\$	550.00	Conference/strategy	
						Conference/strategy	
6/5/2015	KeithF	2.5	Reviewed file re MSJ motion and strategized with AG	\$	687.50	Excessive	
			Draft MSJ Response and Prepare for Hearing and				
6/8/2015	AGraham	10.2	Argue Hearing on Motion to Compel	\$	2,550.00		
			Reviewed file and strategized with AG re forensic			Conference/strategy	
6/8/2015	KeithF	2	exam and MSJ response	\$	550.00	Vague	
			Reviewing and discussing Cell Phone discovery issues				
6/30/2015	AGraham	1.2	with client and Keith Flynn	\$	300.00	Conference/strategy	
			Review matters in file, discuss issue of forensic				
			examination of cell phone of client, review various			Vague	
7/1/2015	RichardM	2	emails	\$		Conference/strategy	
7/2/2015	KeithF	0.5	Emailed OC about phone and spoke to client	\$	137.50	Vague	
			Reviewed scheduling order and emailed OC re				
7/7/2015	KeithF	0.5	forensic exam and jury trial	\$	137.50		
			Stipulated order, communications with Keith Flynn				
7/13/2015	AGraham	3	and opposing counsel	\$	750.00	Conference/strategy	
				١.		Conference/strategy	
7/13/2015	KeithF	0.5	Reviewed stip and order and discussed case with AG	\$	137.50	Vague	
_ , ,			Prepare stipulated order to adjourn our trial dates				
7/14/2015	AGraham	1	and email opposing counsel	\$	250.00		
_ / /			Review cell phone extraction and communicate with				
7/14/2015	AGraham	2	client	\$	500.00		
7/45/2045	5. 1. 18.4		Review matters in file, discuss matters in file with	,	225.00	Vague	
7/15/2015	RichardM	0.75	associates	\$		Conference/strategy	
7/28/2015	KeithF	8	Prepared for and attended motion hearing	\$	2,200.00		
0/42/2045	IX = it l= E	4	Reviewed order re MSJ, reviewed file, and spoke	٠	275.00		
8/12/2015	KeithF	1	with client	\$	275.00		
0/14/2015	A C na h a v	,	[Prepare] Reeser Stip and Order and Second	ے ا	F00.00		
8/14/2015	AGraham	2	Amended Complaint	\$	500.00	Conformed (strategy)	
0/14/2015	V α i+la Γ	0.5	Reviewed amended complaint and discussed with	ے ا	127.50	Conference/strategy	
8/14/2015	KeithF	0.5	AG	\$	137.50	vague	

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description		Fees	Other Reasons to Exclude Entry	
			Conversation re: settlement offer and review of				
9/25/2015	AGraham	0.5	settlement communication	\$	125.00	Conference/strategy	
			Researched jury verdict reports, drafted a demand				
			letter, reviewed the file and strategized with RGM			Conference/strategy	
9/25/2015	KeithF	2.7	and AG	\$	742.50	Vague	
			Review matters in file, discuss settlement strategy			Vague	
9/25/2015	RichardM	0.5	with associates	\$	150.00	Conference/strategy	
			Jury trial prep; reviewed file and strategized and				
10/26/2015	KeithF	1	discussed case with AG	\$	275.00	Conference/strategy	
11/3/2015	AGraham	5.2	[Draft] Motion in Limine and prepare trial binder	\$	1,300.00		
			[Meeting with] Keith re: trial prep and emails to			Conference/strategy	
11/4/2015	AGraham	1	opposing counsel re: subpoenas	\$	250.00	Vague	
			Call and email client re: trial prep dates and				
			witnesses, email opposing counsel re: moving date				
11/5/2015	AGraham	1.2	of final pre-trial conference	\$	300.00		
			[Meeting with] Keith Flynn re: Motion in Limine				
11/6/2015	AGraham	1	revisions, drafting Motion in Limine revisions	\$	250.00	Conference/strategy	
			Emailed OC re final pre-trial conference date and				
11/9/2015	KeithF	0.1	discussed with AG	\$	27.50	Conference/strategy	
			Email client re: pretrial meeting and discussion with				
			Keith Flynn re: same, prepare exhibits with Michelle			Conference/strategy	
11/10/2015	AGraham	1.7	Coil	\$	425.00	CLERICAL	
			Reviewed deps for trial and discussed subpoenas			Vague	
11/12/2015	KeithF	6	with AG	\$	1,650.00	Conference/strategy	
			L				
			Discussion re: rescheduling final pretrial conference	l .			
11/13/2015	AGraham	0.5	and call to court re: rescheduling pretrial conference	\$	125.00	Conference/strategy	
, ,	l	_				Excessive	
11/13/2015	KeithF	3	Reviewed final pre-trial and discussed case with AG	\$	825.00	Conference/strategy	
,		_	[Draft] Final pretrial order and discussions with Keith				
11/16/2015	AGraham	2.7	Flynn re: order	\$	675.00	Conference/strategy	

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry	
			Reviewing exhibits and deps for trial and strategized		Vague	
11/16/2015	KeithF	8	with AG	\$ 2,200.00	Conference/strategy	
			[Draft] Final pretrial order- and calls to opposing			
11/17/2015	AGraham	5	counsel re: final pretrial order	\$ 1,250.00		
			Reviewed file, edited pre-trial order, and discussed		Conference/strategy	
11/17/2015	KeithF	4	case with AG and RGM	\$ 1,100.00	Vague	
			[Prepare] Subpoenas of Witnesses Chanda and			
			Shameeka, discussion with Keith Flynn re:			
11/18/2015	AGraham	0.5	subpoenas	\$ 125.00	Conference/strategy	
			Pre-trial conference discussion with Keith Flynn and			
11/18/2015	AGraham	1	witness discussion	\$ 250.00	Conference/strategy	
			Reviewed subpoenas, pretrial order and exhibits and			
11/18/2015	KeithF	8	discussed case with AG	\$ 2,200.00	Conference/strategy	
			[Draft] Memo on HIPAA violation defenses and			
11/20/2015	AGraham	1.5	discussion with Keith re: subpoenas	\$ 375.00	Conference/strategy	
			Drafted Bork cross exam questions and discussed			
11/20/2015	KeithF	7	case with AG	\$ 1,925.00	Conference/strategy	
			Trial prep with Keith Flynn and client and travel time			
11/21/2015	AGraham	10.5	to and from Flint	\$ 2,625.00	Conference/strategy	
			Phone call to opposing counsel re: subpoenas and			
			pretrial conference meeting, review draft of			
11/23/2015	AGraham	0.7	proposed pretrial materials	\$ 175.00		
11/23/2015	AGraham	2.7	Research and draft memo on HIPAA violations	\$ 675.00		
			Reviewed file, discussed case with RGM and emailed		Conference/strategy	
11/23/2015	KeithF	2	client	\$ 550.00	Vague	
			Final pretrial meeting with opposing counsel and call			
11/24/2015	AGraham	3	to client re: meeting	\$ 750.00	Vague	
			Interview witness Desiree Miller and prepare			
11/24/2015	AGraham	0.7	subpoena	\$ 175.00		
			Met with OC re pre-trial conference and spoke to			
11/24/2015	KeithF	3	client	\$ 825.00	Vague	

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry
			Email client and opposing counsel re: new pretrial		
			conference date, discussion with Keith Flynn re:		
11/25/2015	AGraham	1.1	rescheduling conference	\$ 275.00	Conference/strategy
					Conference/strategy
11/25/2015	KeithF	1	Reviewed file and discussed case with AG	\$ 275.00	Vague
			Email to opposing counsel re: conference dates and		
			call with client re: dates and call to case manager re:		
11/30/2015	AGraham	1	dates	\$ 250.00	CLERICAL
			[Email to] Keith Flynn and opposing counsel re:		
			pretrial conference and discussion with Keith re:		
12/3/2015	AGraham	0.5	settlement	\$ 125.00	Conference/strategy
			[Email to] Re: rescheduling pretrial dates and call to		
12/4/2015	AGraham	0.5	court re: rescheduling pretrial dates	\$ 125.00	
			Call court for pretrial conference times and call client		
			to schedule pretrial conference, discussions with		
12/7/2015	AGraham	0.7	Keith Flynn regarding scheduling	\$ 175.00	Conference/strategy
			And meeting to discuss final pretrial conference		
			dates and informing witnesses of change to trial		
12/8/2015	AGraham	0.5	date	\$ 125.00	Conference/strategy
			[Review and Revise] Final pretrial order and meeting		
1/6/2016	AGraham	3.5	with Keith re: order	\$ 875.00	Conference/strategy
			Review and revise Reeser final pretrial order -		
			objections, phone calls and emails to opposing		
1/8/2016	AGraham	4.2	counsel	\$ 1,050.00	
			[Draft] Joint final pretrial order - call to case		
			manager, email to opposing counsel, call with		
1/12/2016	AGraham	0.5	opposing counsel re order	\$ 125.00	
			Review defendant's changes to the final pretrial		
1/13/2016	AGraham	2.7	order and email opposing counsel	\$ 675.00	
			Final pretrial conference, meet with client re:		
1/19/2016	AGraham	4.5	conference, prepare supplemental responses	\$ 1,125.00	
1/19/2016	KeithF	4	Prepared for and attended final pre-trial conference	\$ 1,100.00	Vague

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#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry	
			Discuss supplement to interrogatories with Keith		Conference/strategy	
1/22/2016	AGraham	0.2	Flynn, call Client	\$ 50.00	Vague	
3/1/2016	KeithF	0.5	Reviewed file and edited settlement statement	\$ 137.50		
3/3/2016	AGraham	0.1	Email to client, call to Kriss Goodroe	\$ 22.50		
			Discussion with Kriss Goodroe re: deposition, review			
3/4/2016	AGraham	1	motion in limine, discuss case with Keith Flynn	\$ 250.00	Conference/strategy	
			Reviewed our Motion in Limine and discussed case			
3/4/2016	KeithF	0.5	with AG	\$ 137.50	Conference/strategy	
			Talk to Keith Flynn about settlement conference,		Conference/strategy	
3/5/2016	AGraham	0.5	email, call, text Client	\$ 125.00	Vague	
3/7/2016	AGraham	3.2	[Draft] Motion in limine, and Kris Goodroe call	\$ 800.00	Vague	
3/10/2016	AGraham	3.7	Settlement conference and prep for conference	\$ 925.00		
			Prepped for and attended Mediation and discussed			
3/10/2016	KeithF	4	with client	\$ 1,100.00	Vague	
			Reply review docs and draft response motions in			
3/30/2016	AGraham	5	Limine and discuss with Keith Flynn	\$ 1,250.00	Conference/strategy	
			Call with client re: Motions in Limine, discussion with			
			Keith Flynn and Michelle Coil, review response to			
3/31/2016	AGraham	1.7	Motions in Limine	\$ 425.00	Conference/strategy	
4/1/2016	AGraham	0.5	Draft letter and discussion with Keith	\$ 125.00	Conference/strategy	
			Discussion with Keith re: Reeser, research for reply		Conference/strategy	
4/6/2016	AGraham	3	brief	\$ 750.00	Vague	
			Discuss with Keith and Michelle re: subpoenas,			
			Reeser- discuss subpoenas with Keith, call Desiree			
4/11/2016	AGraham	0.5	Miller	\$	Conference/strategy	
4/12/2016	AGraham	0.5	Call to court, deliver documents to court	\$ 125.00	CLERICAL	
			Phone call with Natalie Reeser - discussion with			
			Adam Taub, review- Reeser discovery disclosures			
			and reply, Natalie Reeser email, Reeser - discussion			
4/14/2016	AGraham	2.2	re: subpoena	\$ 550.00	Conference/strategy	
4/15/2016	AGraham	8	Attend deposition of Kris Goodroe and travel time	\$ 2,000.00		

### Case 2:14-cv-11916-GCS-SDD ECF No. 121-12, PageID.4147 Filed 07/12/16 Page 12 of 13 FEES ANALYSIS OF OPPOSING COUNSELS' BILLING ENTRIES

#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry	
			Reviewed pleadings and began preparing trial prep			
4/18/2016	KeithF	6	materials	\$ 1,650.00		
			Discuss Reeser motion hearing with Keith Flynn and			
4/20/2016	AGraham	0.7	deal with subpoena issues	\$ 175.00	Conference/strategy	
			Prepping testimony of Wisheart and Hood and		Vague	
4/20/2016	KeithF	7	discussed case with AG	\$ 1,925.00	Conference/strategy	
			Reeser hearing prep and hearing on motions in			
4/21/2016	AGraham	7	limine	\$ 1,750.00		
			Call with Keith Flynn re: discovery, discussion with			
			Michelle Coil re: reissuing subpoenas, emails to		Conference/strategy	
4/22/2016	AGraham	1.6	opposing counsel, telephone to client	\$ 400.00	Vague	
			Reviewed file re medical records and discussed with			
4/22/2016	KeithF	1	AG	\$ 275.00	Conference/strategy	
			Reviewed file and prepped testimony and discussed		Vague	
4/26/2016	KeithF	4	case with AG	\$ 1,100.00	Conference/strategy	
			Discuss subpoenas with Michelle Coil, Reeser-			
4/27/2016	AGraham	2	research subpoena issues, Reeser- prepare for trial	\$ 500.00		
4/28/2016	AGraham	4.5	Meeting with Debra Reeser and trial prep	\$ 1,125.00		
			Prepped notes, reviewed deps, put together trial		CLERICAL	
4/28/2016	KeithF	6	binder, reviewed law	\$ 1,650.00	Vague	
5/2/2016	KeithF	1	Edited Voir Dire questions and theory of the case	\$ 275.00		
			Reviewed subpoena to Plaintiff and medical			
5/2/2016	KeithF	0.7	authorizations and discussed with client	\$ 192.50		
			Reviewed jury instructions and objections to jury			
5/2/2016	KeithF	2	instructions	\$ 550.00		
					Vague	
5/4/2016	KeithF	8	Prepped for and met with client	\$ 2,200.00	Excessive	
			Discuss trial prep with Keith Flynn and Michelle Coil,	<u> </u>		
			review exhibits for trial and follow up call with			
5/5/2016	AGraham	1.7	Debra Reeser	\$ 425.00	Conference/strategy	
					Vague	
5/5/2016	KeithF	10	Prepped for and met with client	\$ 2,750.00	Excessive	

### Case 2:14-cv-11916-GCS-SDD ECF No. 121-12, PageID.4148 Filed 07/12/16 Page 13 of 13 FEES ANALYSIS OF OPPOSING COUNSELS' BILLING ENTRIES

#### **BLOCK BILLING TASKS\***

Date	Atty	Hrs	Description		Fees	Other Reasons to Exclude Entry	
			Phone call with Debra Reeser re: trial prep, discuss				
5/6/2016	AGraham	2	Debra Reeser as potential witness with Keith Flynn	\$	500.00	Conference/strategy	
						Vague	
5/6/2016	KeithF	7	Prepped for and met with client	\$	•	Excessive	
5/8/2016	KeithF	4	Edited and practiced opening statement	\$	1,100.00	Vague	
			Prepped for motion practice, jury instructions, and				
5/8/2016	KeithF	4	reviewed law	\$	1,100.00		
			Attend trial and trial preparation with client before				
5/9/2016	AGraham	12.2	and after trial	\$	3,050.00		
			Attend trial and trial preparation with client before				
5/10/2016	AGraham	11.2	and after trial	\$	2,800.00		
			Attend trial and trial preparation with client before				
5/11/2016	AGraham	11.2	and after trial	\$	2,800.00		
5/12/2016	AGraham	8.5	Attend Reeser trial and discuss with client	\$	2,125.00		
			Attend trial and discuss trial with client, inform				
5/13/2016	AGraham	9.5	witnesses of schedule	\$	2,375.00		
5/13/2016	KeithF	9	Prepped for and attended trial	\$	2,475.00		
5/15/2016	KeithF	6	Edited and practiced closing statement	\$	1,650.00		
			Attend trial and discuss with client, assist in				
5/16/2016	AGraham	10.2	preparing closing	\$	2,550.00		
5/16/2016	KeithF	10	Prepped for and attended trial	\$	2,750.00		
5/16/2016	KeithF	4.5	Edited and practiced closing statement	\$	1,237.50		
					·		
			Attend Trial, discuss trial with client, compile				
5/17/2016	AGraham	12.2	admitted exhibit list, finish drafting damages brief	\$	3,050.00		
5/17/2016	KeithF	9	Prepped for and attended trial	\$	2,475.00		
					,		$\neg$
5/17/2016	RichardM	0.5	Assist in preparation for trial, review matters in file	\$	150.00	Vague	
5/18/2016	AGraham	7.2	Attend trial, discuss verdict with client	\$	1,800.00		$\dashv$
5/18/2016	KeithF	4	Prepped for and attended trial	\$	1,100.00		$\dashv$
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